

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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ALICIA BELTRAN,

Petitioner,

v.

Case No. 13-CV-01101

JIM STRACHOTA, et al.

Respondents.

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**RESPONDENTS JAMES STRACHOTA AND WASHINGTON  
COUNTY CIRCUIT COURT'S MEMORANDUM IN OPPOSITION  
TO PETITIONER ALICIA BELTRAN'S MOTION FOR LEAVE TO FILE  
SUPPLEMENTAL AUTHORITIES IN SUPPORT OF  
NOVEMBER 26, 2013 ORAL ARGUMENT**

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NOW COME respondents James Strachota and the Washington County Circuit Court, by their attorneys, Wilson Elser Moskowitz Edelman & Dicker, LLP, through Douglas S. Knott and Brent A. Simerson, and hereby submit this brief in opposition to petitioner Alicia Beltran's Motion for Leave to File Supplemental Authorities in Support of November 26, 2013 Oral Argument, docket document number 55, filed November 27, 2013.

**ARGUMENT**

These respondents respectfully request that the Court deny Ms. Beltran's motion for leave to supplement the record for the Court's consideration on the respondents' motions to dismiss. Mr. Strachota and the Washington County Circuit Court moved to dismiss the application for writ of habeas corpus on October 25, 2013. (Dkt. Doc. No. 34.) Ms. Beltran filed a 44-page response to the respondents' motions to dismiss with permission from the Court to exceed the page limit. (Dkt. Doc. No. 44.) On November 25, 2013, Ms. Beltran set forth further arguments in opposition to the respondents' motions to dismiss by filing a 10-page Declaration of Attorney Linda S. Vanden Heuvel in Support of Petitioner's Response to Motions to Dismiss.

(Dkt. Doc. No. 54.) Lengthy oral arguments were made to the Court on the pending motions on November 26, 2013.

The arguments in favor of dismissal have not changed since the respondents' October 25, 2013 motion. Ms. Beltran has had ample opportunity to articulate the various legal reasons why she believes the Court should deny the respondents' motions to dismiss. The issues have been exhaustively briefed and argued. These respondents oppose any further attempts to supplement the record presently before the Court.

Dated this 3<sup>rd</sup> day of December, 2013.

**WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP**

s/ Douglas S. Knott

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